

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION

STARR INDEMNITY & LIABILITY
COMPANY, et al.,

Plaintiffs,

v.

LUMBER LIQUIDATORS HOLDINGS,
INC., et al.,

Defendants.

Civil Action No. 4:16cv114-AWA-DEM

RESPONSE TO ORDER TO SHOW CAUSE

Defendant Janet Eley, by and through undersigned counsel, hereby responds as follows to the Court's November 29, 2016 Order to Show Cause:

1. Plaintiffs filed the Complaint on July 1, 2016, which Mrs. Eley timely answered on September 2, 2016.
2. On November 25, 2016, the Court granted the motions for summary judgment filed by Plaintiffs and by Defendants Lumber Liquidators Holdings, Inc., Thomas D. Sullivan, Daniel E. Terrell, William K. Schlegel, Robert M. Lynch, Carl R. Daniels, Jr., Macon F. Brock, Jr., Jeffrey W. Griffiths, Douglas T. Moore, John M. Presley, Peter B. Robinson, Martin F. Roper, Nancy M. Taylor, and Jimmie L. Wade (the "Settling Defendants").
3. As referenced in the Memorandum of Points and Authorities in Support of the Settling Defendants' Motion for Summary Judgment, DE63 at 5 n.8, Mrs. Eley did not oppose that motion because she agreed to execute a release of claims on the policies at issue in this case. She was therefore neutral as to the allocation of the proceeds of the policies.
4. Accordingly, Mrs. Eley does not oppose the dismissal of this action.

Dated: December 1, 2016

By: /s/ Edward J. Fuhr

Edward J. Fuhr (VSB #28082)

Johnathon E. Schronce (VSB #80903)

HUNTON & WILLIAMS LLP

951 E. Byrd Street

Richmond, Virginia 23219-4074

Telephone: 804-788-8201

Facsimile: 804-788-8218

efuhr@hunton.com

jschronce@hunton.com

Counsel for Janet Eley

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have caused a copy of the above to be filed with the Clerk of the Court, which will be submitted on the CM/ECF system, causing it to be served on all registered users and a true and correct copy of the foregoing has been served by electronic mail this 1st day of December, 2016, upon the following:

Mary Catherine Martin
WILEY REIN LLP
1776 K Street, NW
Washington, DC 20006
mmartin@wileyrein.com
Counsel for Starr Indemnity & Liability Company, Travelers Casualty and Surety Company of America, Liberty Insurance Underwriters, Inc., ACE American Insurance Company, and Aspen American Insurance Company

Lyle Roberts
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899
lroberts@cooley.com
Counsel for Lumber Liquidators Holdings, Inc., Macon F. Brock, Jr., Jeffrey W. Griffiths, Douglas T. Moore, John M. Presley, Peter B. Robinson, Martin F. Roper, Nancy M. Taylor, Jimmie L. Wade

Michael R. Goodstein
BAILEY CAVALIERI, LLC
10 W. Broad Street, Suite 2100
Columbus, OH 43215
mgoodstein@baileycav.com
Co-Counsel for ACE American Insurance Company and Aspen American Insurance Company

Benjamin S. Boyd
DLA PIPER LLP
500 8th Street NW
Washington, DC 20004
benjamin.boyd@dlapiper.com
Counsel for Continental Casualty Company

Brian L. Whisler
Jennifer Ancona Semko
BAKER & MCKENZIE LLP
815 Connecticut Avenue, N.W.
Washington, DC 20006
Telephone: (202) 452-7019
Facsimile: (202) 416-6937
brian.whisler@bakermckenzie.com
jennifer.semko@bakermckensie.com
Counsel for Defendant Thomas D. Sullivan

David William O'Brien
Thomas A. Hanusik
CROWELL & MORNING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
dobrien@crowell.com
thanusik@crowell.com
Counsel for Defendant Christopher Battin

Jonathan R. Tuttle
Ada Fernandez Johnson
DEBEVOISE & PLIMPTON LLP
801 Pennsylvania Avenue, N.W., Suite 500
Washington, DC 20004
Telephone: (202) 383-8124
Facsimile: (202) 383-8118
jrtuttle@debevoise.com
afjohnson@debevoise.com
Counsel for Daniel E. Terrell

Connie N. Bertram
Ralph C. Ferrara
Ann M. Ashton
PROSKAUER ROSE LLP
1001 Pennsylvania Avenue, N.W.
Suite 600 South
Washington, DC 20004
Telephone: (202) 416-6899
Facsimile: (202) 416-6899
cbertram@proskauer.com
rferrara@proskauer.com
aashton@proskauer.com
Counsel for Robert M. Lynch

Elizabeth C. Solander
Sean M. Reilly
Kevin T. Abikoff
John F. Wood
HUGHES HUBBARD & REED LLP
1775 I Street, N.W., Suite 600
Washington, DC 20006-2401
Telephone: (202) 721-4600
Facsimile: (202) 721-4646
solander@hugheshubbard.com
kevin.abikoff@hugheshubbard.com
john.wood@hugheshubbard.com
Counsel for William K. Schlegel

Dallas Jacob Egging Kaplan
Ronald Tenpas
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 739-5407
Facsimile: (202) 739-3001
dkaplan@morganlawis.com
Counsel for Defendant Carl R. Daniels, Jr. and Sarah Schoenfeld

Laura C. Marshall
HUNTON & WILLIAMS LLP
951 East Byrd Street
Richmond, VA 23219
Telephone: (804) 787-8013
Facsimile: (804) 788-8218
lmarshall@hunton.com
Counsel for Defendants Adrian Cantu, Ryan Reny, Calvin Robertson, Chuck Hall, Jerrid Denney, Andrew Eaton, Steven Flores, Paul Kuzyk, Steven Sereno, Charles Booth, Ernest Luckett, Brandon Iovino, Michael Bingaman Thomas Berry, Alexandra Hughes, Michael Ward, Jerrico Jordan, Ralph Aubrey Amadeo Jr.

I HEREBY FURTHER CERTIFY that a true and correct copy of the foregoing was mailed with First Class postage by United States mail to the following:

John Tan
REED SMITH
52nd Floor, Wheelock Square
No. 1717 Nanjing Road West
Jing An District Shanghai 200040
China
Telephone +86 21 6032 3126
jtan@reedsmit.com
Counsel for Defendants Danny Wu, Shane Gao, Janet Xu, Philan Jie, Rocky Yang, Michael Wang

Theresa Van Vliet
GENOVESE JOBLOVE & BATTISTA
200 East Broward Boulevard
Suite 1110
Fort Lauderdale, FL 33301
Telephone: (954) 453-8000
Facsimile: (954) 453-8012
tvanyl@gb-law.com
Counsel for Defendant Lisa Kuca

William Dinkin
STONE CARDWELL & DINKIN
101 Shockoe Slip, Suite K
Richmond, VA 23219
Telephone: (804) 359-0000
Facsimile (804) 257-5555
Counsel for Defendant Michael Freeman

Samuel G. Williamson
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1307-1308 Two Exchange Square
8 Connaught Place Central, Hong Kong
China
Telephone: +852 3464 5600
samwilliamson@quinnemanuel.com
Counsel for Defendant David Chau

Laura Hughes McNally
Marc J. Sonnenfeld
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
lmcnally@morganlewis.com
msonnenfeld@morganlewis.com
Counsel for Defendant Carl R. Daniels, Jr.

Jonathan Richman
PROSKAUER ROSE LLP
11 Times Square
New York, NY 10036
jerichman@proskauer.com
Counsel for Robert M. Lynch

/s/ Edward J. Fuhr
Edward J. Fuhr (VSB #28082)
Johnathon E. Schronce (VSB #80903)
HUNTON & WILLIAMS LLP
951 E. Byrd Street
Richmond, Virginia 23219-4074
Telephone: 804-788-8201
efuhr@hunton.com
jschronce@hunton.com
Counsel for Janet Eley